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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

ALEXANDRA RASEY-SMITH;  
GORDON GENE MACCANI; and  
JANET MACCANI,

Plaintiffs,

vs.

CITY OF LOS ANGELES; CALEB  
GARCIA ALAMILLA; and DOES 2-  
10, inclusive

Defendants.

Case No. 2:24-cv-03265-MWC-SSC

**PLAINTIFFS' OPPOSITION TO  
DEFENDANTS' MOTION FOR  
LEAVE TO LODGE VIDEO  
EXHIBITS UNDER SEAL IN  
SUPPORT OF THEIR MOTION  
FOR PARTIAL SUMMARY  
JUDGMENT**

Plaintiffs' Alexandra Rasey-Smith, Gordon Gene Maccani, and Janet Maccani hereby oppose Defendants City of Los Angeles and Caleb Garcia Alamilla's Motion for Leave to Lodge Video Exhibits Under Seal in Support of their Motion for Partial Summary Judgment. (Doc. 53.) As Defendants concede, "there is a strong presumption in favor of public access" to judicial records and

1 against sealing. *See* Defendants’ Mot. (Doc. 53.), pg. 3 (collecting cases); Central  
2 District of California’s Local Rules, Rule 79-5.2.2. Although these videos were  
3 filed pursuant to a protective order, almost all of Defendants’ discovery production  
4 was labeled “confidential” yet Defendants do not seek to submit them under seal as  
5 well. The fact that the videos were filed pursuant to the protective order and  
6 labeled confidential is insufficient to overcome the presumption in favor of public  
7 access.

8 Further, the videos the Defendants seek to exclude were made public by the  
9 Defendant City of Los Angeles when the Los Angeles Police Department posted  
10 their Critical Incident Community Briefing video on YouTube. *See* “Central Area  
11 OIS 02/03/2024 (NRF003-24),”

12 <https://www.youtube.com/watch?v=r6XXO13UEec>. This Briefing includes the  
13 Video Exhibits Defendants seek to lodge under seal. The video has already been  
14 seen by over ninety-thousand people since it was posted on February 20, 2024.

15 Defendants also argue that good cause exists to seal the Video Exhibits  
16 because they contain sensitive depictions of the decedent, Jason Maccani, at the  
17 scene, including him being shot and medical response efforts. Defendants are not  
18 the properly suited party to make this argument. Plaintiffs are the wife and parents  
19 of Mr. Maccani. Plaintiffs’ claims are not only rooted in their constitutional  
20 violations, but they are also rooted in the violation of Mr. Maccani’s rights and the  
21 deprivation of his life. Thus, Plaintiffs are suited to determine whether Mr.  
22 Maccani’s privacy interests are best served by filing the videos under seal, and  
23 Plaintiffs do not wish to have these documents under seal. In addition, if the  
24 proposed videos were placed under seal and remained sealed at trial, the Court  
25 would have to clear the courtroom every time the parties wished to play the videos,  
26 which are key pieces of evidence that will likely be shown multiple times by both  
27 parties throughout the trial. This would be an obvious waste of the Court’s time  
28 and resources and cause repetitive delays throughout the course of trial.

1 For the foregoing reasons, the Court should deny Defendants City of Los  
2 Angeles and Caleb Garcia Alamilla's Motion for Leave to Lodge Video Exhibits  
3 Under Seal in Support of their Motion for Partial Summary Judgment. (Doc. 53.)  
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6 DATED: November 11, 2025 LAW OFFICES OF DALE K. GALIPO

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8 Bv. /s/ Eric Valenzuela  
9 Eric Valenzuela  
Attorneys for Plaintiffs  
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